

1 **LAW OFFICES OF GREGORY W. SMITH**

2 Gregory W. Smith [SBN 134385]
3 9100 Wilshire Boulevard, Suite 345E
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CITY ATTORNEY

2012 JUN 14 PM 5:04

5 **CHRISTOPHER BRIZZOLARA** [SBN 130304]

6 1528 16th Street
7 Santa Monica, California 90404
8 Telephone (310) 394-6447

9 Attorneys for Plaintiff

10 **WILLIAM TAYLOR**

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

12 **COUNTY OF LOS ANGELES**

13 WILLIAM TAYLOR

14 Plaintiff,

15 vs.

16 CITY OF BURBANK, et al.,

17 Defendants.

CASE NO. BC 422 252

[Assigned to the Hon. John L. Segal, Judge,
Dept. "50"]

**DECLARATION OF DOUGLAS G.
BENEDON IN SUPPORT OF
ATTORNEYS' FEES MOTION**

Date: July 9, 2012
Time: 8:30 a.m.
Dept.: "50"

[Filed concurrently with Points &
Authorities and Declarations of Gregory
W. Smith, Christopher Brizzolara, and
Selma Francia]

Action Filed: September 22, 2009
Trial: March 5, 2012

DECLARATION OF DOUGLAS G. BENEDON IN SUPPORT OF
ATTORNEYS' FEES MOTION

I, Douglas G. Benedon, declare:

1. I am an attorney at law duly licensed to practice before all of the courts in the State of California. I am a partner with the law firm of Benedon & Serlin, co-counsel on appeal for Plaintiff William Taylor ("Plaintiff") in the above action. I have personal knowledge of all facts stated in this declaration and, if called upon as a witness, I could and would competently testify thereto.

2. Benedon & Serlin specializes in all aspects of civil appeals. Both partners, Douglas G. Benedon and Gerald M. Serlin, are certified appellate law specialists (State Bar of California Board of Legal Specialization). The firm has handled hundreds of appellate matters in state and federal court, including numerous matters in the California Supreme Court and United States Supreme Court. The firm and both partners are AV rated by Martindale-Hubbel. Both partners have been selected Southern California Super Lawyers, in appellate law, by Law & Politics for the years 2004-2012. (Only five percent of all attorneys are identified as "Super Lawyers.")

3. As detailed in the attached Benedon & Serlin firm resume (Exh. 1), I have been admitted to practice law in the State of California since 1983. For over 25 years, my practice has been exclusively devoted to appellate litigation. I have handled over 200 civil appeals in state and federal court, including a matter before the United States Supreme Court, *Meyer v. Holley* (2003) 537 U.S. 280 [123 S. Ct. 824, 154 L. Ed. 2d 753]. As a practicing attorney for 29 years and as an appellate lawyer for almost 26 years, I have represented individual and corporate clients, as well as the Los Angeles Superior Court.

4. This is an action for retaliation under the Fair Housing and Employment Act ("FEHA"). Plaintiff sue his former employer, defendant City of Burbank ("Defendant"), for retaliation based on allegations he was demoted and eventually fired from Defendant's police department for reporting sexual harassment and racial discrimination in the department. Defendant alleged Plaintiff was fired because he interfered with an internal investigation. Plaintiff therefore

1 sought internal affairs investigation records under Evidence Code sections 1043 and 1045. After an
2 in-camera hearing, this court ordered the records be disclosed. Defendant then filed a petition for
3 writ of mandate, claiming that the in-camera hearing held by this court was procedurally flawed and
4 this court ordered irrelevant documents disclosed. The Court of Appeal issued a stay of the
5 disclosure order and an order to show cause. Following briefing and oral argument by our firm, the
6 Court of Appeal found that the in-camera hearing held by this court was conducted properly, and that
7 this court correctly applied its discretion by ordering all of the documents disclosed. The Court of
8 Appeal therefore denied the petition.

9 5. As counsel responsible for representing Plaintiff in the writ proceedings in the Court
10 of Appeal and as a partner in this firm, I am familiar with the attorneys' fees agreement and the
11 invoices sent to our client. Our firm represented Plaintiff on a contingency fee basis. All costs for
12 research, photocopies, facsimiles, parking, etc. were also charged on a contingent basis. Time sheets
13 were created daily by each attorney and paralegal, kept in the regular course of business, were made
14 at or near the time of the act, condition, or event, and list the work done, and the amount of time
15 spent on each task by the person billing time for the work. Invoices were created from the
16 information on each attorney and paralegal's time sheets. The invoices were prepared and
17 maintained in the regular course of the business, were made at or near the time of the act, condition,
18 or event, and the invoices listed the work done and the person billing time for the work. The sources
19 of information and the method and time of preparation were such as to indicate its trustworthiness.
20 Attached to this motion as Exhibit 2 are true and correct copies of my firm's invoices to Plaintiff on
21 the writ proceedings in this case.

22 6. As part of my work, I have had access to billing rates of numerous other firms,
23 handled issues involving attorneys' fees, and am familiar with the LA County Bar published annual
24 surveys on law firm billing rates in Southern California. Based on my personal knowledge and
25 experience, as well as my contacts in the legal community, the billing rates charged by Benedon &
26 Serlin to Plaintiff in this lawsuit are equal to or lower than the billing rates normally charged in Los
27 Angeles and Orange Counties by most law firms with comparable expertise and experience in
28 appellate law.

1 7. Our firm's customary rate for work of the nature and complexity of this writ
2 proceeding when billed on an hourly basis is \$525 per hour. Benedon & Serlin spent a total of
3 118.50 hours for services connected with reviewing the extensive record, researching and writing
4 the briefs, and appearing for oral argument. Benedon & Serlin's "lodestar" fee in this case is
5 therefore in the amount of \$62,215.50. This figure should be enhanced by a multiplier of 2.0, to
6 reflect the contingent nature of the action, the results obtained, the skill displayed in presenting the
7 case, and the important societal goal advanced by this litigation of deterring retaliation for engaging
8 in protected activity.

9 8. In addition to fees, our firm has incurred a total of \$1,067.31 in costs.
10

11 I declare under penalty of perjury under the laws of the State of California that the foregoing
12 is true and correct and was executed on June 11, 2012 at Woodland Hills, California.

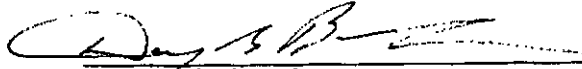
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15 Douglas G. Benedon
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EXHIBIT "1"

BENEDON & SERLIN

ATTORNEYS AT LAW

WARNER CENTER TOWERS

21700 OXNARD STREET, SUITE 1290

WOODLAND HILLS, CALIFORNIA 91367

CERTIFIED APPELLATE LAW SPECIALISTS
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FIRM RESUME

Our firm specializes in all aspects of civil appellate litigation and substantive trial motions. We appear in both state and federal court. Both firm members have been certified as appellate law specialists by the State Bar of California Board of Legal Specialization. Our firm and both members are AV rated by Martindale-Hubbell. In addition, our firm has been recognized for professional achievement in the area of appellate law.

We have over 55 years combined experience in preparing appeals and writs. When contacted by a potential client, we conduct a preliminary evaluation of the matter and determine the likelihood of success on appeal. Should the client elect to proceed, we conduct all necessary research, prepare all required briefs, present oral argument to the court, and seek or oppose further review in the California Supreme Court or the United States Supreme Court. While the appeal is pending, we participate in any on-going settlement negotiations.

Additionally, we assist trial counsel to prepare or oppose substantive trial motions, such as motions for summary judgment, motions in limine, new trial motions, and motions for judgment notwithstanding the verdict. By participating in these earlier stages of litigation, we can help trial counsel preserve issues for appeal, particularly those of first impression or extreme complexity.

BIOGRAPHICAL SUMMARIES

DOUGLAS G. BENEDON, born Los Angeles, California, 1956. *Education:* University of California, San Diego (B.A., History Honors 1977); McGill University, Montreal, Canada (M.A., 1980; LL.B., 1983). Comments Editor, McGill Law Journal. Admitted to California State Bar; U.S. Supreme Court; U.S. Court of Appeals for the Ninth Circuit and Tenth Circuit; U.S. District Courts in California. *Professional Experiences:* Associate, Horvitz & Levy (1987-1993); Associate, Lewitt, Hackman, Hoeflin, Shapiro & Marshall (1985-1987); Associate, Elmer Low Professional Law Corporation (1983-1984). *Member:* California Court of Appeal Settlement Officer, District Two; California Court of Appeal panel attorney for indigent criminal appeals; Los Angeles County (Member, Appellate Courts Committee) and San Fernando Valley Bar Associations; Martindale-Hubbell AV rated; Certified Specialist, Appellate Law, The State Bar of California Board of Legal Specialization; Recipient: 2003 Professional Achievement Award, San Fernando Valley Bar Association; Southern California Super Lawyer, in appellate law, 2004-2012.

GERALD M. SERLIN, born Los Angeles, California, 1958. *Education:* University of California, Berkeley (B.A., History High Honors 1980; B.A., Political Economy Honors 1980); University of Southern California (J.D., 1985). Member, University of Southern California Law Review. Admitted to California State Bar; U.S. Supreme Court; U.S. Court of Appeals (9th Circuit); U.S. District Courts in California. *Judicial Clerkship:* Research Attorney to Acting Presiding Justice Robert E. Rickles (Dec.) (1985-1986) and Associate Justice John H. Hews (Dec.) (1987), California Court of Appeal. *Professional Experiences:* Associate, Horvitz & Levy (1990-1993); Associate, Kelley Drye & Warren (1987-1990). *Member:* California Court of Appeal Settlement Officer, District Two; California Court of Appeal panel attorney for indigent criminal appeals; L.A. County Bar Appellate Elections Evaluations Committee; Los Angeles County and San Fernando Valley Bar Associations; Consumer Attorneys Association of Los Angeles (Nominee for 2009 Appellate Lawyer of the Year); Martindale-Hubbell AV rated; Certified Specialist, Appellate Law, The State Bar of California Board of Legal Specialization. Recipient: Southern California Super Lawyer, in appellate law, 2004-2012.

KELLY R. HORWITZ, born Lewiston, Maine, 1967. *Education*: Northwestern University (B.S., Education and Social Policy 1989); University of Virginia (J.D., 1999). Articles Review Board and Member, University of Virginia Law Review. Admitted to California State Bar; District of Columbia Bar; U.S. District Court for the District of Columbia. *Judicial Clerkships*: Law Clerk to U.S. District Court Judge John A. Houston (2003-2004) and U.S. District Court Judge George P. Schiavelli (2004-2005). Administrative Law Clerk to Chief Judge Alicemarie H. Stotler, U.S. District Court for the Central District of California (2005-2006). *Professional Experience*: Associate, O'Melveny & Myers (1999-2003); Benedon & Serlin (2006-present).

SIGNIFICANT DECISIONS BRIEFED BY OUR FIRM

Federal Court Decisions

United States Supreme Court

- *Meyer v. Holley* (2003) 537 U.S. 280 [123 S. Ct. 824, 154 L. Ed. 2d 753]

United States Court of Appeals

- *Mendiondo v. Centinela Hospital Medical Center, et al.* (9th Cir. 2008) 521 F.3d 1097
- *Moran et al. v. Selig, as Commissioner of Major League Baseball, et al.* (9th Cir. 2006) 447 F.3d 748
- *Tillison v. City of San Diego* (9th Cir. 2005) 406 F.3d 1126
- *Holley v. Crank* (9th Cir. 2005) 400 F.3d 667
- *McGiness v. GTE Service Corp.* (9th Cir. 2004) 360 F.3d 1103
- *Allen v. Pacific Bell* (9th Cir. 2003) 348 F.3d 1113
- *United States of America v. Alli* (9th Cir. 2003) 344 F.3d 1002
- *United States of America v. Davoudi* (9th Cir. 1999) 172 F.3d 1130
- *Winnans v. State Farm Fire & Cas. Co.* (9th Cir. 1992) 968 F.2d 884

Bankruptcy Appellate Panel

- *In re Telluride Income Growth LP* (10th Cir. BAP 2007) 364 B.R. 407

State Court Decisions

California Supreme Court

- *In re Estate of Duke* (2011) 201 Cal.App.4th 559 rev. granted
- *People v. Hajjaj* (2010) 50 Cal.4th 1184
- *Manco v. Bezdikian* (2008) 45 Cal.4th 192
- *McDonald v. Antelope Valley Comm. College* (2008) 45 Cal.4th 88
- *People v. Salas* (2006) 37 Cal.4th 967
- *Hartford Fire Ins. Co. v. Macri* (1992) 4 Cal.4th 318
- *Moore v. Regents of the University of Calif.* (1991) 51 Cal.3d 120, cert. den., (1991) 499 U.S. 936

California Court of Appeal

- *Joaquin v. City of Los Angeles* (2012) 202 Cal.App.4th 1207
- *Pacific Caisson & Shoring, Inc. v. Bernards Bros. Inc.* (2011) 198 Cal.App.4th 681
- *Blue Water Sunset, LLC v. Markowitz* (2011) 192 Cal.App.4th 477
- *In re Papaz Family Trust* (2010) 189 Cal.App.4th 1200
- *Jhaveri v. Teitelbaum* (2009) 176 Cal.App.4th 740
- *Pelayo v. J.J. Lee Management Co., Inc.* (2009) 174 Cal.App.4th 484
- *Avila v. Continental* (2008) 165 Cal.App.4th 1237
- *Arteaga v. Brinks* (2008) 163 Cal.App.4th 327
- *Best Interiors, Inc. v. Millie and Severson, Inc.* (2008) 161 Cal.App.4th 1320
- *Titan Electric Corp. v. Los Angeles Unified School Dist., et al.* (2008) 160 Cal.App.4th 188
- *Guimaraes v. Northrop Grumman Corp.* (2007) 156 Cal.App.4th 644
- *McNairy v. C.K. Realty* (2007) 150 Cal.App.4th 1500
- *Baxter v. Peterson* (2007) 150 Cal.App.4th 673
- *Estate of Oadian* (2006) 145 Cal.App.4th 152
- *Huff v. Wilkins* (2006) 138 Cal.App.4th 732
- *General Casualty Insurance v. W.C.A.B.* (2005) 131 Cal.App.4th 345, depb.
- *People v. Hamilton* (2003) 114 Cal.App.4th 932
- *People v. Pinkston* (2003) 112 Cal.App.4th 387
- *Woodliff v. California Insurance Guarantee Association* (2003) 110 Cal.App.4th 1690
- *Davcon v. Roberts & Morgan* (2003) 110 Cal.App.4th 1355
- *People v. Szymanski* (2003) 109 Cal.App.4th 1126
- *Claxton v. Atlantic Richfield Co.* (2003) 108 Cal.App.4th 327
- *People v. Kelly W.* (2002) 95 Cal.App.4th 468
- *Reed v. Superior Court* (2001) 92 Cal.App.4th 448
- *Rosenman v. Christensen, Miller, Fink, Jacobs, Glaser, Weil, & Shapiro* (2001) 91 Cal.App.4th 859
- *Century City Medical Plaza v. Sperling, Isaacs & Eisenberg* (2001) 86 Cal.App.4th 865
- *Hussoldt v. Patrick Media Group, Inc.* (2000) 84 Cal.App.4th 153
- *Hanson v. Grode* (1999) 76 Cal.App.4th 601
- *Great Western Casinos, Inc. v. Morongo Band of Mission Indians* (1999) 74 Cal.App.4th 1407
- *People v. Velasquez* (1999) 69 Cal.App.4th 503
- *Farnham v. City of Los Angeles* (1998) 68 Cal.App.4th 1097
- *Kolani v. Gluska* (1998) 64 Cal.App.4th 402
- *People v. Gill* (1998) 60 Cal.App.4th 743
- *Williams v. Superior Court* (1996) 46 Cal.App.4th 320
- *Marriage of Maytag* (1994) 26 Cal.App.4th 1711
- *People v. Higgins* (1994) 26 Cal.App.4th 247
- *State Farm Fire & Cas. Co. v. Jioras* (1994) 24 Cal.App.4th 1619
- *Franklin v. Marie Antoinette Condominium Owners Assn.* (1993) 19 Cal.App.4th 824
- *Pleasant v. Celli* (1993) 18 Cal.App.4th 841
- *Hoffman v. State Farm Fire & Casualty Co.* (1993) 16 Cal.App.4th 184
- *Nola M. v. University of Southern California* (1993) 16 Cal.App.4th 421
- *Hurley Construction Co. v. State Farm Fire & Casualty Co.* (1992) 10 Cal.App.4th 533
- *Burns v. 20th Century Ins. Co.* (1992) 9 Cal.App.4th 1666
- *Blanchard v. State Farm Fire & Cas. Co.* (1991) 2 Cal.App.4th 345
- *Waldsmith v. State Farm Fire & Cas. Co.* (1991) 232 Cal.App.3d 693
- *United Community Church v. Garcin* (1991) 231 Cal.App.3d 327
- *Prieto v. State Farm Fire & Cas. Co.* (1990) 225 Cal.App.3d 1188
- *Thomas v. Chadwick* (1990) 224 Cal.App.3d 813
- *Ferraro v. Chadwick* (1990) 221 Cal.App.3d 86
- *Virgin v. State Farm Fire & Cas. Co.* (1990) 218 Cal.App.3d 1372
- *Centinela Community Hospital v. Superior Court* (1989) 215 Cal.App.3d 971

PUBLICATIONS

- The Long Goodbye: The Effect Of Tolling On Legal Malpractice Practice Claims. *Los Angeles Daily Journal*, December 15, 2011.
- People in the News. *Valley News Group*, March 26, 2009.
- Equitable Tolling of the FEHA Statute of Limitations. *California Labor & Employment Law Review* (Publication of the State Bar of California Labor and Employment Law Section) March 2009.
- Expert Advice. *California Lawyer* (Publication of the Daily Journal Corporation) September 1999.
- Farnham Expands Municipal Immunity For Urban Bike Paths. *Los Angeles Lawyer* (Publication of the Los Angeles County Bar Association) July/August 1999.
- How To Lose Your Right To Arbitrate Without Really Trying. *Litigation* (Publication of the Los Angeles County Bar Association) Winter 1997/1998.
- Obtaining Relief From Deemed Admissions. *Advocate* (Publication of the Consumer Attorneys Association of Los Angeles) January 1996.
- Racial Hostility in the Workplace: Assessment from the Perspective of a Reasonable Person with the Victim's Same Racial Traits. *Forum* (Publication of the Consumer Attorneys of California) May 1995.
- Civil Discovery and the Privilege Against Self-Incrimination. *Advocate* (Publication of the Consumer Attorneys Association of Los Angeles) March 1995.
- Courts Clarify Physician's Immunity In Reporting Child Abuse. *California Physician* June 1991.
- Appellate Court Settlement. *Alternatives* (Publication of the American Bar Association) Winter 1986/1987.

PANELS AND CONFERENCES

- Chair of Annual Panel Discussion on the Changing Supreme Court, Featuring Ninth Circuit Judges Alex Kozinski and Stephen Reinhardt. 1998 - 2005.
- Speaker at California Association of Realtors Legal Affairs Forum. January 2003.
- Speaker at State Bar of California Conference on Appellate Practice. September 1997.
- Speaker at San Diego Conference on Responding to Child Maltreatment. January 1994.

INSTRUCTION

- Guest Lecturer at University of Southern California -- Gould School of Law. November 2011.
- Instructor for Calabasas High School and Viewpoint School -- Constitutional Rights Foundation Mock Trial Competition. 2004-2009, 2011.
- Instructor for San Fernando Valley School of Law and West Los Angeles School of Law, Traynor Moot Court Competition. 2005-2009, 2012.
- Instructor on Post-Trial Motions and Appeals, Los Angeles Valley College. 1998-1999.

EXHIBIT "2"

BENEDON & SERLIN
Attorneys at Law
21700 Oxnard Street, Suite 1290
Woodland Hills, CA 91367

Invoice submitted to:
Greg Smith
Law Offices of Gregory W. Smith
9100 Wilshire Boulevard, Suite 345E
Beverly Hills, CA 90212

March 22, 2012

In Reference To: Taylor v. City of Burbank

Invoice # 70689

Professional Services

	<u>Hours</u>
1/20/2011 Consults with Brizzolara and G. Smith re: writ.	0.50
1/24/2011 Review and analysis of record; legal research.	8.00
1/25/2011 Review and analysis of record; legal research; preparation of application for an extension of time.	8.00
1/26/2011 Review and analysis of record; legal research.	7.30
1/27/2011 Review and analysis of record; legal research.	6.80
1/28/2011 Legal research.	6.60
1/31/2011 Preparation of return.	8.30
2/1/2011 Legal research; preparation of return.	7.20
2/2/2011 Legal research; preparation of return.	9.30
2/3/2011 Review and edit return; legal research.	2.00
2/4/2011 Legal research; preparation of second return.	6.80
2/7/2011 Legal research; preparation of second return.	6.80
Revise and edit first return.	1.00

	<u>Hours</u>	
2/8/2011 Legal research; preparation of second return.	6.20	
Review and edit writ return.	1.35	
2/9/2011 Revise, edit, and finalize second return.	4.30	
2/10/2011 Revise, edit, and finalize returns.	3.00	
4/11/2011 Prepare for oral argument.	4.00	
4/12/2011 Review and analysis of record; legal research; preparation of oral argument.	8.30	
Assist D. Benedon prepare for oral argument.	1.50	
4/13/2011 Travel; preparation of oral argument; oral argument.	6.50	
5/24/2011 Review and analysis of opinions; conference with G. Serlin; telephone conference with co-counsel.	2.00	
Review opinions and conference with D. Benedon.	1.25	
5/25/2011 Review and analysis of opinions.	1.00	
6/8/2011 Review petition for rehearing.	0.50	
		<u>Amount</u>
For professional services rendered	118.50	\$0.00
Additional Charges :		
1/27/2011 L.A.S.C. - online document download.		16.89
1/28/2011 Photocopy charges.		19.00
1/31/2011 Postage.		9.15
Messenger service.		52.45
West Law.		17.94
2/1/2011 L.A.S.C. - online document download.		7.50
L.A.S.C. - online document download.		15.00
2/10/2011 Outside photocopy charges.		257.03
Paralegal - preparation of returns; cite check.		375.00

Greg Smith

Page 3

	<u>Amount</u>
2/14/2011 Outside photocopy charges.	43.81
2/25/2011 Photocopy charges.	18.50
2/28/2011 West Law.	141.96
Postage.	48.20
3/30/2011 Photocopy charges.	12.50
3/31/2011 Postage.	3.66
West Law.	16.72
4/13/2011 Parking.	12.00
Total costs	<u>\$1,067.31</u>
Total amount of this bill	<u>\$1,067.31</u>
6/6/2011 Payment - thank you. Check No. 7847	<u>(\$880.47)</u>
Total payments and adjustments	<u>(\$880.47)</u>
Balance due	<u><u>\$1,067.31</u></u>

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PROOF OF SERVICE

STATE OF CALIFORNIA)
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years of age, and am not a party to the within action; my business address is 9100 Wilshire Boulevard, Suite 345E, Beverly Hills, California 90212.

On the date hereinbelow specified, I served the foregoing document, described as set forth below on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes, at Beverly Hills, addressed as follows:

DATE OF SERVICE : June 11, 2012
DOCUMENT SERVED : **DECLARATION OF DOUGLAS G. BENEDON IN
SUPPORT OF ATTORNEYS' FEES MOTION**
PARTIES SERVED : **SEE ATTACHED SERVICE LIST.**

XXX (BY REGULAR MAIL) I caused such envelope(s) with postage thereon fully prepaid to be placed in the United States mail at Beverly Hills, California. I am "readily familiar" with firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. postal service on that same day in the ordinary course of business. I am aware that on motion of party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

XXX (BY ELECTRONIC MAIL) I caused such document to be electronically mailed to **Christopher Brizzolara, Esq.** at the following e-mail address: samorai@adelphia.net.

XXX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

— (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

EXECUTED at Beverly Hills, California on June 11, 2012.

Selma I. Francia

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SERVICE LIST

WILLIAM TAYLOR v. CITY OF BURBANK
LOS ANGELES COUNTY SUPERIOR COURT CASE NO. BC 422 252

Christopher Brizzolara, Esq.
1528 16th Street
Santa Monica, California 90404
(By Electronic Mail Only)

Ronald F. Frank, Esq.
Robert J. Tyson, Esq.
Burke Williams & Sorenson LLP
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Amelia Ann Albano, City Attorney
Carol A. Humiston, Sr. Asst. City Atty.
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Burbank, California 91510

Linda Miller Savitt, Esq.
Philip L. Reznik, Esq.
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